

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

MOUSSA SACKO : **CHAPTER 13**
: **Debtor** : **Bankruptcy No. 16-15151-elf**

**STIPULATION IN SETTLEMENT OF DEBTOR'S
OBJECTION TO BOTH AMENDED PROOF OF CLAIM NO. 4 AND
NOTICE OF POST-PETITION MORTGAGE FEES, EXPENSES, AND CHARGES
FILED BY U.S. BANK, NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE
ON BEHALF OF AND WITH RESPECT TO AJAX MORTGAGE LOAN TRUST 2016-2
MORTGAGE-BACKED NOTES, SERIES 2016-2, ON APRIL 16, 2019**

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Debtor's 06/03/2019 Objection to Amended Proof of Claim No. 4 and Notice of Post-Petition Mortgage Fees, Expenses, and Charges filed by U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2016-2, Mortgage-Backed Notes, Series 2016-2 ("U.S. Bank"), filed on 04/16/2019.

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

1. Debtor's Objection to the Amended Proof of Claim No. 4, filed on 06/03/2019 at docket number 168, is hereby withdrawn with prejudice. No further objections to the Amended Proof of Claim, nor amendments to the Proof of Claim, shall be permitted.
2. U.S. Bank's Notice of Post-Petition Mortgage Fees, Expenses and Charges filed on 04/16/2019 is hereby withdrawn with prejudice. No further Notices of Post-Petition Mortgage Fees, Expenses and Charges for the period through the date of Court approval of this Stipulation shall be permitted.
3. U.S. Bank shall remove the fees and costs associated with the Notice of Post-Petition Mortgage Fees, Charges and Expenses filed on 04/16/2019 from the Debtor's account. A

copy of the Notice of Post-Petition Mortgage Fees, Charges and Expenses is attached hereto as **Exhibit “A”**.

4. The “must be tried” hearing scheduled for September 13, 2019 at 9:00 am as it relates to U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2016-2, Mortgage-Backed Notes, Series 2016-2 is hereby cancelled as settled.

STIPULATED AND AGREED TO BY:

REGIONAL BANKRUPTCY CENTER OF SOUTHEASTERN PA, P.C., by:



ROGER V. ASHODIAN, Esquire
Attorney for Debtor(s)

POWERS KIRN, LLC, by:

Date: August 13, 2019

/s/ Jill Manuel-Coughlin, Esquire
JILL MANUEL-COUGHLIN, Esquire
Attorney for Gregory Funding LLC as servicer
for U.S. Bank National Association, as
Indenture Trustee on behalf of and with respect
to Ajax Mortgage Loan Trust 2016-2, Mortgage-
Backed Notes, Series 2016-2

NO OBJECTION:

Date: _____

WILLIAM C. MILLER, Esquire
Chapter 13 Standing Trustee

AND NOW, the foregoing Stipulation is approved by the Court.

Date: _____

United States Bankruptcy Judge
Eric L. Frank